

CMR

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

U.S. BANK NATIONAL ASSOCIATION
TRUSTEE FOR THE PHFA

PLAINTIFF

-against-

AISHA RHODES

CONSUMER, [Defendant]

17 1774

NOTICE OF REMOVAL
MOTION TO TRANSFER TO
TO MISCELLANEOUS CASE

COMES NOW, the Consumer [Defendant], removing party Aisha Rhodes, erroneously referred to as, [Defendant], Occupant and in direct support of this Notice to this Honorable District Court, Judge for the Eastern District of Pennsylvania the following is hereby stated;

NOTICE OF REMOVAL

Pursuant to the express and specific language of 28 USC 1441, 1331, Federal Question, Constitution, 15 USC 1692k(3)(D), Fair Debt Collection Practices Act, 12 CFR 226.23, Truth in Lending act et seq, immediately upon the filing of this Notice with the Clerk of this Honorable Court, this case has already been removed.

The removal of jurisdiction from the foreign state tribunal to this Article III, competent judicial District Court Eastern District of Pennsylvania is automatic, by operation of federal, state laws, and does not require any additional written order from the Eastern District of Pennsylvania to cause this removal to become effective - the removal is an automatic judicial event, and immediate by operation of law.

Put another way, the United States Supreme Court Clarified and established, clear back in 1966; The petition is now filed in the first instance in the federal court. After notice is given to all adverse parties and a copy of the petition is filed with the state tribunal, removal is effected and state court proceedings muse cease unless for some reason is remanded . 28 USC 1446(1964 ed.)

Because this cause is now removed, the instant state Tribunal is without jurisdiction, if it ever had it, to affect any judgment, ruling, in these proceedings, 28 USC 1446(c)(3). The warrant of removal to the Eastern District of Pennsylvania is attached hereto as required by the express language of the

federal law. (See, “Exhibit A & B). This Tribunal has demonstrated a lack of compliance with even its own private state law, much less federal laws.

In *Spokeo*, the Supreme Court reaffirmed the well-established principle that a plaintiff invoking jurisdiction of an Article III court must establish “injury in fact” *Spokeo*, Slip op. at . In particular, “a plaintiff must show that he or she suffered ‘an invasion of a legally protected interest’ that is ‘concrete and particularized’ and ‘actual or imminent, not conjectural or hypothetical.’” *Id.* at 7 (quoting *Lujan v. Defenders of Wildlife*, 504 U.S. 555, 560 (1992)).

Spokeo also reaffirms the longstanding principle that the required “legally protected interest” may be an interest that Congress has granted legal protection by creating a statutory right. See *id.* At 9 (reaffirming that “Congress may ‘elevate to the status of legally cognizable injuries concrete, de facto injuries that were previously inadequate in law’” (quoting *Lujan*, 504 U.S. at 578) (alteration omitted)); accord *Warth v. Seldin*, 422 U.S. 490, 500 (1975) (“The actual or threatened injury required by Article III, may exist solely by virtue of statutes creating legal rights, the invasion of which creates standing”

FACTUAL HISTORY

The Consumer Aisha Rhodes, named above and referred to erroneously as [Defendant] in an action and suit brought by a third party debt collector(s), attempting to collect an alleged debt which derived, pertains to interstate, international commerce within the United States, territory. The alleged debt(s) are instrumentalities of interstate commerce and obligations of the United States, of America.

The types of debts alleged by the [Plaintiff] debt collector(s) are not intra state debts created by, under any foreign state laws outside the United States, territory. The consumer is a federally protected person, as well the actions, pursuit of said debts are expressly defined in federal consumer protection laws, statutes, specifically, but not limited to the Fair Debt Collection Practices Act, 15 USC 1692 et seq. The consumer who is also secured creditor are properly defined within the federal statute at 1692a(3)(4).

The debt collector(s) acting as Plaintiff’s named above are easily defined in 1692a(6), attempting to collect alleged debt(s) defined in 1692a(5), along with all the attached pleadings disguised as communications defined in 1692a(2). (See exhibit A & B”) The alleged Plaintiff, debt collector(s) are subject to, and governed by all federal laws, statutes, rules which regulates all debt collection activities within the United States, territories.

Accordingly, none of the debt instruments relied upon by the Plaintiff, debt collectors(s) are of an intra state nature, pertaining to any foreign covert private state. However, the federal statute clearly defines the proper competent State, judicial district and court to bring such claims against a consumer. Specifically, the jurisdiction, venue this illegal action was brought in, against the consumer is “not exempt under either 1692a(6)(c), 1692 o, or properly defined in 1692a(6)(8). Furthermore, the debt collector(s) [Plaintiff’s] brought this debt collection action while fully aware that such foreign, unknown covert private “state” tribunal, forum was ill equipped to adjudicate the action

Consequently, the federal statute is clear that such debt collection actions, even against “real property” if applicable, must be brought in a competent judicial district, court defined in 1692i and 1692k(3)(d) respectively. In light of this fact the debt action brought against the consumer with federal

and constitutional protections were intentionally, illegally and unlawfully brought in an unlawful, foreign, convert, jurisdiction, tribunal outside the United States, federal territory.¹

The debt collector(s), [Plaintiff] in this action routinely engage in abusive, illegal, deceptive, civil and even criminal acts against federally protected consumers by circumventing many federal laws, protections that would otherwise not allow the violators to succeed if brought before a properly clothed, competent judicial district, court under Article III, of the Constitution, complete with a proper Article III Judge. Therefore, the consumer who is protected federally internationally, regardless of any alleged location, can remove, enforce, defend each of these federal protections, in any competent judicial district defined in 1692k(3)(D).

For reasons obvious to the consumer regarding either, the lack of jurisdiction, constitutional authority, judicial competence under Article III, of the US Constitution. Many state district tribunals are Article I,IV, inferior legislative tribunals engaged in, authorized by the Congress under the Commerce Clause. It has become obvious that these legislative tribunals, courts are either reluctant to support, protect consumer under federal law, constitutions. Or, in the alternative there is more serious dilemma whereby inferior tribunals, courts are obstructing consumers.

This significant issue and ploy against Consumers, by just about every tribunal, court within every federal territory, has become yet another concerted effort to prevent, discourage, distract the Consumer from Enforcement, defense, protection from foreign, local state trespassers, mainly attorney debt collectors. The debt collector(s) here routinely, illegally engage in the unlicensed practice of law, 1692e(3) as it pertains to interstate commerce, federal debt collection activities, lack of approval, authorization, inadequate bonding, indemnification and the most abusive behavior and conduct against consumers.

As such these debt collectors, especially those particular foreign state, courts that falsely simulate represent, hold themselves out to be officials, officers, judicial districts, courts, affiliated with the United States, or any State within federal territory subject to federal laws, constitution(s) in violation of 1692e(1)(7)(8)(9)(10)(13)(14), 1692c(b),1692b(5) and 1692f(6) respectively. With much credit, respect and praise to the US Congress who enacted these federal protections and the ability, authority in the form of Private Right of Action, self-enforcing, to justify compliance supported by federal laws and constitutions.

The consumer has standing pursuant to Article III, to bring this Enforcement and Compliance Action under federal consumer laws against the parties named above. The other reason for the consumer bringing this Enforcement Action is due to the fact the consumer file complaints with the United States of America Consumer Financial Protection Bureau, Federal Trade Commission and US Justice Department.

¹ Supreme Court Queens County is a debt collector as defined in 1692a(6), is not exempt under 1692a(6)(c)(8). This Tribunal is a private law firm acting in a foreign, covert, territory not in the United States. The consumer has served upon the Supreme Court queens County, under federal law, consumer protection statutes.

The consumer is most grateful, honored, supportive and indebted to the Agencies of the CFPB, FTC, US Justice Department's who acting as agent for the American People, who act as consumers, natural persons obtaining goods and services for personal, family and household purposes. The CFPB has succeeded in doing what previous multiple federal agencies failed to do in the last several decades.

The Dodd Frank Act which created agencies like the CFPB, and enhanced the power of other agencies already activated like the FTC to tackle this enormous, destructive banking system failure and those debt collectors that now attempts to extend the fraud and crimes of the predecessor banks. In Light of this, the CFPB, FRC, USDOJ, will likely have an interest in this matter, as an investigation may be pending on behalf of the consumer with such agencies regarding numerous violations of federal, constitutional laws.

Specifically, the debt collectors in this matter are not only in contempt of the consumer, federal protection laws, but as well the CFPB, FTC based on communications received from these agencies on the consumer's behalf. These communications to these debt collectors, from the consumer, also derived from the CFPB.

The Consumer will make a valiant effort to comply with certain civil rules, especially those that are promulgated by the US Supreme Court, 28 USC 2072, 2071, which does not conflict with the law(s) of the cae, FDCPA, other federal consumer protection laws. This is an Enforcement Action and Proceedings, not a Complaint under a conventional litigation structure.

For purposes of this Enforcement Action, the consumer will as the Court, judge, to witness such compliance proceedings and ratification of the subsequent Decree and Consent Order the consumer will serve.

WHEREFORE the undersigned Consumer, Aisha Rhodes removes this federal action to The United States District Court Eastern District of Pennsylvania, for enforcement Proceedings and Compliance

Dated this 18th day of April 2017

By: 
Aisha Rhodes

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

_____	}	
U.S. BANK NATIONAL ASSOCIATION)	
TRUSTEE FOR THE PHFA	}	
PLAINTIFF	}	NOTICE OF REMOVAL
	}	MOTION TO TRANSFER TO
-against-	}	TO MISCELLANEOUS CASE
	}	
AISHA RHODES	}	
	}	
CONSUMER, [Defendant]	}	
_____	}	

CERTIFICATE OF SERVICE

I certify a copy of the above document was served by US Mail to the following parties:

KML LAW GROUP PC
701 MARKET STREET SUITE 5000
MELLON INDEPENDENCE CENTER
PHILADELPHIA PA 19106

Office of Judicial Records - Civil
First Judicial District of Pennsylvania
Room 284 **City Hall**
Philadelphia, PA 19107
REF CASE ID #'s (130302766) & (161000075)

MARCLY JEAN-PAUL,
5546 MIRIAM RD PHILADELPHIA PA 19124

EXHIBIT "A"

Court of Common Pleas of Philadelphia County
Trial Division
Civil Cover Sheet

		For Prothonotary Use Only (Docket Number)	
		MARCH 2013	
		002766	
PLAINTIFF'S NAME U.S. BANK NATIONAL ASSOCIATION TRUSTEE FOR THE PHFA		DEFENDANT'S NAME AISHA RHODES	
PLAINTIFF'S ADDRESS 211 NORTH FRONT STREET PO BOX 15057 HARRISBURG PA 17101		DEFENDANT'S ADDRESS 6230 NORTH NORWOOD STREET PHILADELPHIA PA 19138	
PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
TOTAL NUMBER OF PLAINTIFFS 1	TOTAL NUMBER OF DEFENDANTS 1	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input checked="" type="checkbox"/> Other: MORTGAGE FORECLOSURE		
CASE TYPE AND CODE 3D - RESIDENTIAL OWNER OCCUPIED-MR			
STATUTORY BASIS FOR CAUSE OF ACTION			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)		FILED PRO PROTHY MAR 20 2013 J. OSTROWSKI	
		IS CASE SUBJECT TO COORDINATION ORDER? YES NO	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>U.S. BANK NATIONAL ASSOCIATION TRUSTEE FOR THE PHFA</u> Papers may be served at the address set forth below.			
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY MICHAEL T. MCKEEVER		ADDRESS KML LAW GROUP PC 701 MARKET STREET SUITE 5000 MELLON INDEPENDENCE CENTER PHILADELPHIA PA 19106	
PHONE NUMBER (215) 627-1322	FAX NUMBER (215) 627-7734		
SUPREME COURT IDENTIFICATION NO. 56129		E-MAIL ADDRESS filings@goldbecklaw.com	
SIGNATURE OF FILING ATTORNEY OR PARTY MICHAEL MCKEEVER		DATE SUBMITTED Wednesday, March 20, 2013, 09:28 am	

KML LAW GROUP, P.C.

SUITE 5000 - BNY MELLON INDEPENDENCE CENTER

701 MARKET STREET

PHILADELPHIA, PA 19106

(866) 413-2311

WWW.KMLLAWGROUP.COMU.S. BANK NATIONAL ASSOCIATION, (TRUSTEE
FOR THE PENNSYLVANIA HOUSING FINANCE
AGENCY, PURSUANT TO A TRUST INDENTURE
DATED AS OF APRIL 1, 1982)

211 North Front Street

PO Box 15057

Harrisburg, PA 17101

Plaintiff

vs.

AISHA RHODES

Mortgagor(s) and Record Owner(s)

6230 North Norwood Street

Philadelphia, PA 19138

Defendant(s)

IN THE COURT OF

OF Philadelphia

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

No.

**NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after the Complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claim in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

COMMUNITY LEGAL SERVICES, INC.

Law Center North Central

1410 W. Erie Avenue

Philadelphia, PA 19140

215-227-2400 or 215-981-3700

PHILADELPHIA BAR ASSOCIATION

One Reading Center

Philadelphia, PA 19104

215-238-6333

A V I S O

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta ascantar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademias, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO. VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

SI USTED NO PUEDE PAGARLE A UN ABOGADO, ÉSTA OFICINA PUEDE PROVEERÉ INFORMACION ACERCA AGENCIAS QUE PUEDAN OFRECER SERVICIOS LEGAL A PERSONAS ELIGIBLE AQ UN HONORARIO REDUCIDO O GRATIS.

COMMUNITY LEGAL SERVICES, INC.

Law Center North Central
1410 W. Erie Avenue
Philadelphia, PA 19140
215-227-2400 or 215-981-3700

PHILADELPHIA BAR ASSOCIATION

One Reading Center
Philadelphia, PA 19104
215-238-6333

**THIS FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO COLLECT
A DEBT OWED TO OUR CLIENT. ANY INFORMATION OBTAINED FROM YOU
WILL BE USED FOR THE PURPOSE OF COLLECTING THE DEBT.**

RESOURCES AVAILABLE FOR HOMEOWNERS IN FORECLOSURE

ACT NOW!

Even though your lender (and our client) has filed an Action of Mortgage Foreclosure against you, you still may be able to SAVE YOUR HOME FROM FORECLOSURE.

- 1). Call an attorney. For referrals to a qualified attorney call either of the following numbers: 215-227-2400 or 215-981-3700 or 215-238-6333.
- 2). Call the Consumer Credit Counseling Agency at 1-800-989-2227 for free counseling.
- 3). Visit HUD'S website www.hud.gov for Help for Homeowners Facing the Loss of Their Homes.
- 4). Pennsylvania Housing Finance Agency also offers other loan programs that may assist homeowners in default. Please See the PHFA website <http://www.phfa.org/consumers/homeowners/real.aspx>.
- 5). Call the Plaintiff (your lender) and ask to speak to someone about Loss Mitigation or Home Retention options.
- 6). Foreclosure Resource Center: <http://www.philadelphiafed.org/foreclosure/>
- 7). Call or contact our office to request the amount to bring the account current, or payoff the mortgage or request a Loan Workout / Home Retention Package. Call our toll free number at 1-866-413-2311 or via email at homeretention@kmlawgroup.com. Call Seth at 215-825-6329 or fax 215-825-6429. The figure and/or package you requested will be mailed to the address that you request or faxed if you leave a message with that information. The attorney in charge of our firm's Homeowner Retention Department is David Fein who can be reached at 215-825-6318 or Fax: 215-825-6418. Please reference our Attorney File Number of 120065FC.

Para informacion en espanol puede comunicarse con Loretta al 215-825-6344.

This Action of Mortgage Foreclosure will continue unless you take action to stop it.

COMPLAINT IN MORTGAGE FORECLOSURE

1. Plaintiff is U.S. BANK NATIONAL ASSOCIATION, (TRUSTEE FOR THE PENNSYLVANIA HOUSING FINANCE AGENCY, PURSUANT TO A TRUST INDENTURE DATED AS OF APRIL 1, 1982), 211 North Front Street, PO Box 15057 Harrisburg, PA 17101.
2. The name(s) and address(es) of the Defendant(s) is/are AISHA RHODES, 6230 North Norwood Street, Philadelphia, PA 19138, who is/are the mortgagor(s) and record owner(s) of the mortgaged premises hereinafter described.
3. On June 11, 2007 mortgagor(s) made, executed and delivered a mortgage upon the Property hereinafter described to SOVEREIGN BANK, which mortgage is recorded in the Office of the Recorder of Deeds of Philadelphia County on June 27, 2007 as Document #51721752. The mortgage has been assigned to: U.S. BANK NATIONAL ASSOCIATION, (TRUSTEE FOR THE PENNSYLVANIA HOUSING FINANCE AGENCY, PURSUANT TO A TRUST INDENTURE DATED AS OF APRIL 1, 1982) by assignment of Mortgage. Plaintiff is the real party in interest pursuant to an Assignment of Mortgage to Plaintiff attached as Exhibit C. The Mortgage and Assignment(s) (if any) are matters of public record and are incorporated by this reference in accordance with Pennsylvania Rule of Civil Procedure 1019(g); which Rule relieves the Plaintiff from its obligation to attach documents to pleadings if those documents are matters of public record.
4. The Property subject to the Mortgage is more fully described in the legal description set forth as Exhibit "A" ("Property").
5. The mortgage is in default because the monthly payments of principal and interest are due and unpaid for August 01, 2012 and each month thereafter and by the terms of the Mortgage, upon default in such payments for a period of one month or more, the entire principal balance and all interest due and other charges are due and collectible.
6. The following amounts are due to Plaintiff on the Mortgage:

Principal Balance	\$59,811.76
Interest from 07/01/2012 through 02/27/2013 at 5.9500%.....	\$2,115.75
Per Diem interest rate at \$9.89	
Late Charges	\$107.45
Monthly late charge amount at \$15.35	
Monthly Escrow amount \$133.24	
Escrow Deficit	\$761.55
Deferred Late Charges	\$506.55
Reasonable Attorney's Fee	\$1,650.00
	<u>\$64,953.06</u>

7. If the Mortgage is reinstated prior to a Sheriff's Sale, the Attorney's Fees set forth above may be less than the amount demanded based on work actually performed. Plaintiff reserves the right to request additional attorney's fees if the complexity of the action results in fees in excess of the amount demanded. Further, Plaintiff will request recovery of all costs incurred in this action including, but not limited to, costs of suit, process serving and skip tracing, title searches, recording costs and any other costs of the action in accordance with the mortgage documents and applicable law.

8. Plaintiff is not seeking a judgment of personal liability (or an "in personam" judgment) against the Defendants in this Action but reserves its right to bring a separate Action to establish that right, if such right exists. If Defendants have received a discharge of their personal liability in a Bankruptcy proceeding, this Action of Mortgage Foreclosure is, in no way, an attempt to re-establish the personal liability that was discharged in Bankruptcy, but only to foreclose the Mortgage and sell the Property pursuant to Pennsylvania law.
9. Notice of Intention to Foreclose has been sent to Defendants by certified mail, as required by Act 6 of 1974 of the Commonwealth of Pennsylvania, on the date set forth in the true and correct copy of such Notice attached and incorporated as Exhibit "B".

WHEREFORE, Plaintiff demands a de terris judgment in mortgage foreclosure in the sum of \$64,953.06, together with interest at the rate of \$9.89, per day and other expenses, costs and charges incurred by the Plaintiff which are properly chargeable in accordance with the terms of the Note and Mortgage and Pennsylvania law until the Mortgage is paid in full, and for the foreclosure of the Mortgage and Sheriff's Sale of the Property.

By: 

KML LAW GROUP, P.C.

☒ Michael McKeever Pa. ID 56129

☐ Jay E. Kivitz Pa. ID 26769

☐ Lisa Lee Pa. ID 78020

☐ Kristina Murtha Pa. ID 61858

☐ David Fein Pa. ID 82628

☐ Thomas Puleo Pa. ID 27615

☐ Joshua I. Goldman Pa. ID 205047

☐ Jill P. Jenkins Pa. ID 306588

☐ Andrew F. Gornall Pa. ID 92382

☐ Alyk L. Oflazian Pa. ID 312912

☐ Salvatore Filippello Pa. ID 313897

Attorneys for Plaintiff

VERIFICATION

I, Thomas F. Brzana, Jr., as the representative of the Plaintiff corporation within named do hereby verify that I am authorized to and do make this verification on behalf of the Plaintiff corporation and the facts set forth in the foregoing Complaint are true and correct to the best of my information and belief. I understand that false statements therein are made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

Date: _____

Thomas F. Brzana Jr.


#120065FC - AISHA RHODES
6230 North Norwood Street Philadelphia, PA 19138

EXHIBIT B

Civil Cover Sheet

OCTOBER 2016

000007

PLAINTIFF'S NAME <i>Marcly Jean-Paul</i>		DEFENDANT'S NAME <i>UNKNOWN All occupants</i>									
PLAINTIFF'S ADDRESS <i>5546 MIRIAM RD Phila PA 19124</i>		DEFENDANT'S ADDRESS <i>6230 N NORWOOD street Phila PA</i>									
PLAINTIFF'S NAME		DEFENDANT'S NAME									
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS									
PLAINTIFF'S NAME		DEFENDANT'S NAME									
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS									
TOTAL NUMBER OF PLAINTIFFS <i>1</i>	TOTAL NO. OF DEFENDANTS	COMMENCEMENT OF ACTION <input type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions									
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Other:										
CASE TYPE AND CODE (SEE INSTRUCTIONS) <div style="text-align: right; font-size: 2em; font-family: cursive;">3R Ejectment</div>											
STATUTORY BASIS FOR CAUSE OF ACTION (SEE INSTRUCTIONS) <div style="text-align: right; font-size: 1.5em; font-family: cursive;">OCT-3112:5</div>											
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER) <div style="text-align: center;"> <i>Jean-Paul Vs Unknown Occupants-CMPLT</i>  16100007500003 </div>			IS CASE SUBJECT TO COORDINATION ORDER? <table border="1"> <tr> <th>Yes</th> <th>No</th> </tr> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>	Yes	No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Yes	No										
<input type="checkbox"/>	<input type="checkbox"/>										
<input type="checkbox"/>	<input type="checkbox"/>										
<input type="checkbox"/>	<input type="checkbox"/>										

TO THE PROTHONOTARY:

Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant:

Papers may be served at the address set forth below.

NAME OF PLAINTIFF/PETITIONER/APPELLANT/ATTORNEY <i>MARCLY Jean-Paul</i>		ADDRESS (SEE INSTRUCTIONS) <i>5546 MIRIAM RD Philadelphia PA 19124</i>	
PHONE NUMBER <i>484 602 1164</i>	FAX NUMBER	EMAIL ADDRESS	
SUPREME COURT IDENTIFICATION NO.		DATE <i>10/03/2016</i>	
SIGNATURE <i>Marcly Jean-Paul</i>			

FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
COURT OF COMMON PLEAS OF PHILADELPHIA

MARCY Jean Paul

OCTOBER 2016

VS

All Unknow occupants

000075

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.

Philadelphia Bar Association
Lawyer Referral
and Information Service
One Reading Center
Philadelphia, Pennsylvania 19107
(215) 238-6333
TTY (215) 451-6197

10-284

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta ascantar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademias, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

Lleve esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.

Asociacion De Licenciados
De Filadelfia
Servicio De Referencia E
Informacion Legal
One Reading Center
Filadelfia, Pennsylvania 19107
(215) 238-6333
TTY (215) 451-6197

MARCY JEAN-PAUL
Plaintiff

ATTEST

OCTOBER 2016

OCT 3 2016

JUDICIAL RECORDS
J. MURPHY

000075

Term, 20

No.

Control No.

v.

UNKNOWN occupants
All
Defendant

(Please fill in information below)

- 1) Plaintiff is, Marcy, Jean-Paul with an address 5546 Miriam Rd Philadelphia PA 19124.
- 2) Defendants are UNKNOWN All
- 3) The Defendants, UNKNOWN All occupy the Property which is located at 6230 N NORWOOD Street Philadelphia PA 19138
- 4) Plaintiff is the owner of the property by virtue of A Deed from the Sheriff.
- 5) Plaintiff is entitled to immediate Possession of the property.
- 6) Plaintiff has Demanded Possession of the Property of the from the Defendants, who have refused to deliver UP Possession
- 7) Plaintiff is entitled to immediate Possession of the Property wherefore, Plaintiff Request Judgment for Possession of the Property.

VERIFICATION

Plaintiff(s)

MARCY Jean-Paul

hereby verify that the statements set forth in the foregoing Complaint are true and correct to the best of my knowledge, information, and belief; I understand that these statements are made subject to the penalties of 18 Pa.C.S. §4904, relating to unsworn falsification to authorities.

MARCY Jean-Paul
Signature of Plaintiff

Signature of Plaintiff

Dated:

10/03/2016

1605-346

Know all Men by these Presents

THAT I, Jewell Williams, Sheriff of the County of Philadelphia in the Commonwealth of Pennsylvania, for and in consideration of the sum of TWENTY-THREE THOUSAND FIVE HUNDRED AND XX / 100 [\$23,500.00] dollars, to me in hand paid, do hereby grant and convey to MARCLY JEAN-PAUL .

DESCRIPTION

BRT#: 172488600

Premises Being: 6230 N NORWOOD ST, PHILADELPHIA, PA 19138-2528

SEE ATTACHED LEGAL DISCRPTION

The same having been sold, on the 2nd day of August Anno Domini Two Thousand Sixteen, after due advertisement, according to the law, under and by virtue of a Writ of Execution/DECREE issued out of the Court of Common Pleas as of March Term, Two Thousand Thirteen Number 2766 as the suit of:

U.S. BANK NATIONAL ASSOCIATION ((TRUSTEE FOR THE PENNSYLVANIA HOUSING FINANCE AGENCY, PURSUANT TO A TRUST INDENTURED DATED AS OF APRIL 1, 1982))

VS.

AISHA RHODES

In witness whereof, I have hereunto affixed my signature this 11th day of August Anno Domini Two Thousand Sixteen.

SEALED AND DELIVERED
IN THE PRESENCE OF:

Harold R. Frank
Harold R. Frank (Aug 11, 2016)

Witness

Jewell Williams, SHERIFF

BY

Richard T. Iyer
Richard T. Iyer (Aug 11, 2016)

Witness

Joseph C. Vignola
Joseph C. Vignola (Aug 11, 2016)

Joseph C. Vignola, Undersheriff

Commonwealth of Pennsylvania

County of Philadelphia

On this, the 11 Aug 2016, before me, the undersigned Officer, personally appeared JEWELL WILLIAMS, BY HIS/HER UNDERSHERIFF JOSEPH C. VIGNOLA, Sheriff of the County of Philadelphia, known to me (or satisfactorily proven) to be the person described in the foregoing instrument, and acknowledged that he/she executed the same in the capacity therein stated and for the purposes therein contained.

In-Witness Whereof, I hereunto set my hand and official seal.



Steven J. Wulko
 Steven J. Wulko, Deputy Director

Office of Judicial Records
 Steven J. Wulko, Deputy Director

Book No. 1605
 Writ No. 346
 Control No.

Deed = Poll

Jewell Williams, SHERIFF

TO

MARCLY JEAN-PAUL

U.S. BANK NATIONAL ASSOCIATION (TRUSTEE FOR THE
 PENNSYLVANIA HOUSING FINANCE AGENCY, PURSUANT TO
 A TRUST INDENTURED DATED AS OF APRIL 1, 1982))

VS.

AISHA RHODES

Mar. T. 2013

No. 2766

Premises:

6230 N NORWOOD ST
 PHILADELPHIA, PA19138-2528

Sheriff of the County of Philadelphia
 Captain Richard Verrecchio
 Witness
 Real Estate/Settlement Dept.
 Land Title Building
 100 South Broad Street 5th Floor
 Philadelphia, PA19110

The Address of the within-named Grantee
 5546 MIRIAM ROAD

PHILADELPHIA, PA19124

On behalf of the Grantee

Jewell Williams, SHERIFF
 Philadelphia Sheriff Office